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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEITH BUCKLEY,

Plaintiff,

v.

BANK OF AMERICA, N.A., AND
JPMORGAN CHASE BANK, N.A.

Defendants.

Case No. 2:22-CV-00896-GMN-NJK

**UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's Complaint (First Request):

On June 6, 2022, Plaintiff filed his Complaint [ECF No. 1]. The Summons to Defendant was issued on June 6, 2022 [ECF No. 4] and purportedly served on June 10, 2022. Defendant has 21 days from when the summonses was served to file its response to the Complaint, which made the current deadline July 1, 2022.

BANA's counsel is still investigating the allegations raised in Plaintiff's Complaint. Further, Plaintiff and Defendants have discussed extending the deadline 30-days for BANA to respond to the Complaint, in order to explore early resolution opportunities.

On June 27, 2022, BANA received approval of a 30-day extension to respond to the Complaint from Plaintiff's counsel, which would make the response due July 27, 2022.

1 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline
2 for BANA to file its response to Plaintiff's Complaint to July 27, 2022. This is the first request
3 for extension of time for BANA to respond to Plaintiff's Complaint. The extension is requested in
4 good faith and is not for purposes of delay or prejudice to any other party. Further, the unopposed
5 motion is being submitted as a result of excusable neglect because of a communication delay with
6 Plaintiff's counsel as to the format and procedure for the request for extension.

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8 Dated this 13th day of July, 2022.

9 WRIGHT, FINLAY & ZAK, LLP

10 /s/ Jory C. Garabedian

11 Darren T. Brenner, Esq.

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Attorneys for Bank of America, N.A.

15 The Court is not persuaded that
16 excusable neglect exists based on the
17 assertion presented. Nonetheless, as a
18 one-time courtesy, the Court will
GRANT the unopposed extension
request.

IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

21 DATED: July 14, 2022
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